

EXHIBIT 18

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18 OTTO TRUCKING LLC

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

29 WAYMO LLC,
30 Plaintiff,
31 v.
32 UBER TECHNOLOGIES, INC., *et al.*,
33 Defendants.

34 Case No. 3:17-cv-00939-WHA

35 **DEFENDANT OTTO TRUCKING LLC'S
36 OBJECTIONS AND RESPONSES TO
37 PLAINTIFF WAYMO LLC'S SECOND
38 SET OF EXPEDITED REQUESTS FOR
39 PRODUCTION**

40 Trial Date: October 10, 2017

41 PROPOUNDING PARTY: Plaintiff: WAYMO LLC
42 RESPONDING PARTY: Defendant: OTTO TRUCKING LLC
43 SET: Second Set of Expedited Requests for Production

1 Pursuant to Federal Rules of Civil Procedure 26 and 33, Defendant Otto Trucking LLC
2 (“Otto Trucking”) hereby provides objections and responses (“Objections” and “Responses”) to
3 Plaintiff Waymo LLC’s (“Waymo”) Second Set of Expedited Requests for Production (the
4 “Requests”) served by Waymo on Otto Trucking on May 26, 2017.

5 **PRELIMINARY STATEMENT**

6 Otto Trucking states that it is responding to the Requests to the best of its present ability.
7 Otto Trucking has not completed its pre-trial research, investigation, or analysis of all the facts
8 relating to this case, however, and has not completed its preparation for trial. Accordingly, while
9 these Responses are based upon appropriate investigation by Otto Trucking and its counsel, they
10 reflect the current state of Otto Trucking’s knowledge respecting the matters about which inquiry
11 is made. Thus, the information contained herein remains subject to further review, and, in making
12 these Responses, Otto Trucking reserves the right to amend, supplement, and/or otherwise change
13 its Responses to these Requests as further investigation and discovery may make appropriate in
14 accordance with Otto Trucking’s obligations under the Federal Rules of Civil Procedure.
15 Furthermore, Otto Trucking has prepared these Responses based on its good faith interpretation
16 and understanding of each individual Request, but Otto Trucking reserves its right to correct any
17 errors or omissions.

18 Otto Trucking does not waive or intend to waive any objections that it may have regarding
19 the use of any information provided, and Otto Trucking expressly reserves the rights to: (a) object
20 to Plaintiff’s use of any information provided on the ground of inadmissibility; and (b) object on
21 any and all proper grounds, at any time, to any other discovery involving or relating to any
22 information produced. No incidental or implied admissions are intended by the Responses set
23 forth herein.

24 These Responses are made solely for the purpose of this action. Nothing herein shall be
25 construed as an admission respecting the admissibility or the relevance of any facts, documents, or
26 information, as an admission that documents or information exist, or as an admission as to the
27 truth or accuracy of any characterization or assertion contained in any Request. Each Response is
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1 subject to all objections as to competence, relevance, materiality, propriety, and admissibility, and
2 any and all other objections on grounds that would require the exclusion of any statement herein if
3 any of the Requests were asked of, or statements contained herein were made by, a witness present
4 and testifying in court, all of which objections and grounds are reserved and may be interposed at
5 the time of trial.

6 **GENERAL OBJECTIONS**

7 1. Otto Trucking objects to the Requests to the extent it purports to impose any
8 obligations upon Otto Trucking beyond those imposed by the Federal Rules of Civil Procedure,
9 the Local Rules of the United States District Court for the Northern District of California, and any
10 applicable orders of this Court, including the Order Granting in Part and Denying in Part
11 Plaintiff's Motion for Provisional Relief.

12 2. Otto Trucking objects to the Requests on the grounds that they are overbroad and
13 unduly burdensome, indefinite as to time and scope, call for information not relevant to any claim
14 or defense in this litigation, and are not proportional to the needs of the case.

15 3. Otto Trucking objects to each and every Request to the extent it seeks information
16 protected from discovery by the attorney-client privilege, the work product doctrine, the joint
17 defense privilege, or any other privilege. Plaintiff's discovery will not be construed to seek such
18 information. Inadvertent disclosure of privileged information is not intended to be, and may not
19 be construed as, a waiver of any applicable privilege or similar basis for non-disclosure.

20 4. Otto Trucking reserves the right to supplement or amend its responses if new or
21 further information is obtained in accordance with Federal Rule of Civil Procedure 26(e).

22 **SPECIFIC OBJECTIONS AND RESPONSES TO REQUESTS FOR PRODUCTION**

23 **REQUEST FOR PRODUCTION NO. 10:**

24 All lab notebooks belonging to LiDAR personnel or associated with LiDAR workstations.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

26 Otto Trucking incorporates each of its general objections by reference. Otto Trucking
27 further objects to this Request as not "reasonably narrow" or relevant to its "trade secret

1 misappropriation claims *only*,” as required by the Court’s Order Granting in Part and Denying in
2 Plaintiff’s Motion for Provisional Relief. (Dkt. No. 464). Otto Trucking further objects to
3 this Request as vague and ambiguous, as to the terms “LiDAR personnel” and “LiDAR
4 workstations” are nowhere defined.

5 Subject to and without waiving the foregoing objections, Otto Trucking responds as
6 follows: Otto Trucking has not located any documents responsive to this Request in its
7 possession, custody, or control following a diligent search.

8 **REQUEST FOR PRODUCTION NO. 11:**

9 DOCUMENTS sufficient to show how the placement of FAC lenses on laser diodes is
10 performed.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

12 Otto Trucking incorporates each of its general objections by reference. Otto Trucking
13 further objects to this Request as not “reasonably narrow” or relevant to its “trade secret
14 misappropriation claims *only*,” as required by the Court’s Order Granting in Part and Denying in
15 Plaintiff’s Motion for Provisional Relief. (Dkt. No. 464).

16 Subject to and without waiving the foregoing objections, Otto Trucking responds as
17 follows: Otto Trucking has not located any documents responsive to this Request in its
18 possession, custody, or control following a diligent search.

19 **REQUEST FOR PRODUCTION NO. 12:**

20 DOCUMENTS sufficient to show the design of any assembly tools for FAC lenses.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

22 Otto Trucking incorporates each of its general objections by reference. Otto Trucking
23 further objects to this Request as not “reasonably narrow” or relevant to its “trade secret
24 misappropriation claims *only*,” as required by the Court’s Order Granting in Part and Denying in
25 Plaintiff’s Motion for Provisional Relief. (Dkt. No. 464). Otto Trucking further objects to
26 this Request as vague and ambiguous, as the term “assembly tools” is nowhere defined.

27 Subject to and without waiving the foregoing objections, Otto Trucking responds as

1 follows: Otto Trucking has not located any documents responsive to this Request in its
2 possession, custody, or control following a diligent search.

3 **REQUEST FOR PRODUCTION NO. 13:**

4 All COMMUNICATIONS between Brian McClendon and LEVANDOWSKI.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

6 Otto Trucking incorporates each of its general objections by reference. Otto Trucking
7 further objects to this Request as not “reasonably narrow” or relevant to its “trade secret
8 misappropriation claims *only*,” as required by the Court’s Order Granting in Part and Denying in
9 Part Plaintiff’s Motion for Provisional Relief. (Dkt. No. 464). Otto Trucking objects to this
10 Request as overly broad and unduly burdensome to the extent it seeks “[a]ll
11 COMMUNICATIONS.”

12 Subject to and without waiving the foregoing objections, Otto Trucking responds as
13 follows: Otto Trucking has not located any communications responsive to this Request in its
14 possession, custody or control following a diligent search.

15 **REQUEST FOR PRODUCTION NO. 14:**

16 All COMMUNICATIONS between Brian McClendon and any PERSON REGARDING
17 OTTOMOTTO or OTTO TRUCKING before August 23, 2016.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 14:**

19 Otto Trucking incorporates each of its general objections by reference. Otto Trucking
20 further objects to this Request as not “reasonably narrow” or relevant to its “trade secret
21 misappropriation claims *only*,” as required by the Court’s Order Granting in Part and Denying in
22 Part Plaintiff’s Motion for Provisional Relief. (Dkt. No. 464). Otto Trucking further objects to
23 this Request to the extent it seeks information or materials not within Otto Trucking’s possession,
24 custody, or control.

25 Subject to and without waiving the foregoing objections, Otto Trucking responds as
26 follows: Otto Trucking has not located any communications responsive to this Request in its
27 possession, custody or control following a diligent search.

1 **REQUEST FOR PRODUCTION NO. 15:**

2 All COMMUNICATIONS between Travis Kalanick and LEVANDOWSKI.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

4 Otto Trucking incorporates each of its general objections by reference. Otto Trucking
5 further objects to this Request as not “reasonably narrow” or relevant to its “trade secret
6 misappropriation claims *only*,” as required by the Court’s Order Granting in Part and Denying in
7 Part Plaintiff’s Motion for Provisional Relief. (Dkt. No. 464). Otto Trucking objects to this
8 Request as overly broad and unduly burdensome to the extent it seeks “[a]ll
9 COMMUNICATIONS.”

10 Subject to and without waiving the foregoing objections, Otto Trucking responds as
11 follows: Otto Trucking has not located any communications responsive to this Request in its
12 possession, custody or control following a diligent search.

13 **REQUEST FOR PRODUCTION NO. 16:**

14 All COMMUNICATIONS between Travis Kalanick and any PERSON REGARDING
15 LiDAR.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

17 Otto Trucking incorporates each of its general objections by reference. Otto Trucking
18 further objects to this Request as not “reasonably narrow” or relevant to its “trade secret
19 misappropriation claims *only*,” as required by the Court’s Order Granting in Part and Denying in
20 Part Plaintiff’s Motion for Provisional Relief. (Dkt. No. 464). Otto Trucking further objects to
21 this Request to the extent it seeks information or materials not within Otto Trucking’s possession,
22 custody, or control. Otto Trucking further objects to this Request to the extent that it seeks
23 communications protected by the attorney client privilege, the attorney work product doctrine,
24 joint defense or common interest privilege, and/or any other applicable privilege or immunity.

25 Subject to and without waiving the foregoing objections, Otto Trucking responds as
26 follows: Otto Trucking has not located any communications responsive to this Request in its
27 possession, custody or control following a diligent search.

1 **REQUEST FOR PRODUCTION NO. 17:**

2 All COMMUNICATIONS between Travis Kalanick and any PERSON REGARDING,
3 LEVANDOWSKI, OTTOMOTTO or OTTO TRUCKING before August 23, 2016.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

5 Otto Trucking incorporates each of its general objections by reference. Otto Trucking
6 further objects to this Request as not “reasonably narrow” or relevant to its “trade secret
7 misappropriation claims *only*,” as required by the Court’s Order Granting in Part and Denying in
8 Part Plaintiff’s Motion for Provisional Relief. (Dkt. No. 464). Otto Trucking further objects to
9 this Request to the extent it seeks information or materials not within Otto Trucking’s possession,
10 custody, or control. Otto Trucking further objects to this Request to the extent that it seeks
11 communications protected by the attorney client privilege, the attorney work product doctrine,
12 joint defense or common interest privilege, and/or any other applicable privilege or immunity.

13 Subject to and without waiving the foregoing objections, Otto Trucking responds as
14 follows: Otto Trucking has not located any communications responsive to this Request in its
15 possession, custody or control following a diligent search.

16 **REQUEST FOR PRODUCTION NO. 18:**

17 All invoices submitted to any DEFENDANT in connection with the March 4 Engagement
18 Letter (Exhibit 3 to the May 8, 2017 Declaration of Eric A. Tate in Support of Defendants’
19 Opposition to Waymo’s Motion to Compel).

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

21 Otto Trucking incorporates each of its general objections by reference. Otto Trucking
22 further objects to this Request as not “reasonably narrow” or relevant to its “trade secret
23 misappropriation claims *only*,” as required by the Court’s Order Granting in Part and Denying in
24 Part Plaintiff’s Motion for Provisional Relief. (Dkt. No. 464). Otto Trucking further objects to
25 this Request to the extent that it seeks communications protected by the attorney client privilege,
26 the attorney work product doctrine, joint defense or common interest privilege, and/or any other
27 applicable privilege or immunity.

1 Subject to and without waiving the foregoing objections, Otto Trucking responds as
2 follows: Otto Trucking has not located any documents or communications responsive to this
3 Request in its possession, custody or control following a diligent search.

4 **REQUEST FOR PRODUCTION NO. 19:**

5 All COMMUNICATIONS between any DEFENDANT and John Gardner.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 19:**

7 Otto Trucking incorporates each of its general objections by reference. Otto Trucking
8 further objects to this Request to the extent that it seeks communications protected by the joint
9 defense or common interest privilege. Otto Trucking further objects to this Request to the extent
10 that it seeks communications protected by the attorney client privilege, the attorney work product
11 doctrine, and/or any other applicable privilege or immunity. Otto Trucking further objects to this
12 Request as not “reasonably narrow” or relevant to its “trade secret misappropriation claims *only*,”
13 as required by the Court’s Order Granting in Part and Denying in Part Plaintiff’s Motion for
14 Provisional Relief. (Dkt. No. 464). Otto Trucking further objects to this Request to the extent it
15 seeks documents unrelated to any claims or defenses in this matter. Otto Trucking objects to this
16 Request as overly broad and unduly burdensome to the extent it seeks “[a]ll
17 COMMUNICATIONS.”

18 Subject to and without waiving the foregoing objections, Otto Trucking responds as
19 follows: documents responsive to this Request are subject to the joint defense privilege, common
20 interest privilege, attorney-client privilege, and the attorney work-product doctrine, and have been
21 logged in privilege logs served on April 13, 2017 in Defendants’ Supplemental Privilege Log
22 Associated with March 31, 2017 Production of Documents, on April 27, 2017 in Defendants’
23 Amended Supplemental Privilege Log Associated with March 31, 2017 Production of Documents,
24 on April 28, 2017 in Defendants’ Privilege Log Associated with March 31, 2017 Production of
25 Documents, on May 1, 2017 in Defendants’ Privilege Log Associated with March 31, 2017
26 Production of Documents, and on May 22, 2017 in Uber Technologies, Inc. and Ottomotto LLC’s
27 Privilege Log 5.22.2017 (O’Melveny & Myers LLP).

1 **REQUEST FOR PRODUCTION NO. 20:**

2 All agreements and “software modules” identified in Sections 2.8, 2.10 and 2.15 of the
3 OTTOMOTTO DISCLOSURE SCHEDULES.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 20:**

5 Otto Trucking incorporates each of its general objections by reference. Otto Trucking
6 further objects to this Request as not “reasonably narrow” or relevant to its “trade secret
7 misappropriation claims *only*,” as required by the Court’s Order Granting in Part and Denying in
8 Part Plaintiff’s Motion for Provisional Relief. (Dkt. No. 464).

9 Subject to and without waiving the foregoing objections, Otto Trucking responds as
10 follows: Otto Trucking has not located any documents responsive to this Request in its
11 possession, custody, or control following a diligent search.

12 **REQUEST FOR PRODUCTION NO. 21:**

13 All agreements identified in Sections 2.10 and 2.15 of the OTTO TRUCKING
14 DISCLOSURE SCHEDULES.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

16 Otto Trucking incorporates each of its general objections by reference. Otto Trucking
17 further objects to this Request as not “reasonably narrow” or relevant to its “trade secret
18 misappropriation claims *only*,” as required by the Court’s Order Granting in Part and Denying in
19 Part Plaintiff’s Motion for Provisional Relief. (Dkt. No. 464).

20 Subject to and without waiving the foregoing objections, Otto Trucking responds as
21 follows: Otto Trucking states that it has produced documents responsive to this Request. Otto
22 Trucking will further produce indemnification agreements and restricted unit purchase agreements
23 responsive to this Request following a diligent search.

24 **REQUEST FOR PRODUCTION NO. 22:**

25 All agreements between TYTO and/or ODIN WAVE, on the one hand, and any
26 DEFENDANT or LEVANDOWSKI, on the other, and any disclosures, schedules, exhibits,
27 appendices, or attachments to such agreements.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

2 Otto Trucking incorporates each of its general objections by reference. Otto Trucking
3 further objects to this Request as not “reasonably narrow” or relevant to its “trade secret
4 misappropriation claims *only*,” as required by the Court’s Order Granting in Part and Denying in
5 Part Plaintiff’s Motion for Provisional Relief. (Dkt. No. 464). Otto Trucking objects to this
6 Request as overly broad and unduly burdensome to the extent it seeks “[a]ll agreements.”

7 Subject to and without waiving the foregoing objections, Otto Trucking responds as
8 follows: Otto Trucking has not located any agreements responsive to this Request in its
9 possession, custody or control following a diligent search.

10 **REQUEST FOR PRODUCTION NO. 23:**

11 All COMMUNICATIONS between any DEFENDANT and NALUX REGARDING FAC
12 lenses or LIDAR.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 23:**

14 Otto Trucking incorporates each of its general objections by reference. Otto Trucking
15 further objects to this Request as not “reasonably narrow” or relevant to its “trade secret
16 misappropriation claims *only*,” as required by the Court’s Order Granting in Part and Denying in
17 Part Plaintiff’s Motion for Provisional Relief. (Dkt. No. 464). Otto Trucking objects to this
18 Request as overly broad and unduly burdensome to the extent it seeks “[a]ll
19 COMMUNICATIONS.”

20 Subject to and without waiving the foregoing objections, Otto Trucking responds as
21 follows: Otto Trucking has not located any documents responsive to this Request in its
22 possession, custody or control following a diligent search.

23 **REQUEST FOR PRODUCTION NO. 24:**

24 All DOCUMENTS AND COMMUNICATIONS REGARDING any of
25 LEVANDOWSKI’s past and present “Authorized Devices” (as that term is defined in
26 UBER00006444, Section 7), INCLUDING (without limitation) any request for approval in
27 connection with Section 7.2 or any de-authorization (whether contemplated or effectuated *[sic]*)

1 under Section 7.3.

2 **RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

3 Otto Trucking incorporates each of its general objections by reference. Otto Trucking
4 further objects to this Request as not “reasonably narrow” or relevant to its “trade secret
5 misappropriation claims *only*,” as required by the Court’s Order Granting in Part and Denying in
6 Part Plaintiff’s Motion for Provisional Relief. (Dkt. No. 464). Otto Trucking further objects to
7 this Request to the extent that it seeks information protected by the attorney client privilege, the
8 attorney work product doctrine, joint defense or common interest privilege, and/or any other
9 applicable privilege or immunity.

10 Subject to and without waiving the foregoing objections, Otto Trucking responds as
11 follows: Otto Trucking has not located any documents or communications responsive to this
12 Request in its possession, custody or control following a diligent search.

13 **REQUEST FOR PRODUCTION NO. 25:**

14 All DOCUMENTS REGARDING the satisfaction of conditions for closing in the
15 ACQUISITION DOCUMENTS.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 25:**

17 Otto Trucking incorporates each of its general objections by reference. Otto Trucking
18 further objects to this Request as not “reasonably narrow” or relevant to its “trade secret
19 misappropriation claims *only*,” as required by the Court’s Order Granting in Part and Denying in
20 Part Plaintiff’s Motion for Provisional Relief. (Dkt. No. 464). Otto Trucking objects to this
21 Request to the extent it seeks documents protected by the attorney-client privilege, the attorney-
22 work product doctrine, the joint defense privilege and any other applicable privileges.

23 Subject to and without waiving the foregoing objections, Otto Trucking responds as
24 follows: Documents responsive to this Request are subject to the joint defense privilege, the
25 common interest privilege, the attorney-client privilege, the attorney work-product doctrine, and
26 have been logged in privilege logs served on April 13, 2017 in Defendants’ Supplemental
27 Privilege Log Associated with March 31, 2017 Production of Documents, on April 27, 2017 in
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1 Defendants' Amended Supplemental Privilege Log Associated with March 31, 2017 Production of
2 Documents, on April 28, 2017 in Defendants' Privilege Log Associated with March 31, 2017
3 Production of Documents, on May 1, 2017 in Defendants' Privilege Log Associated with March
4 31, 2017 Production of Documents, and on May 22, 2017 in Uber Technologies, Inc. and
5 Ottomotto LLC's Privilege Log 5.22.2017 (O'Melveny & Myers LLP).

6 **REQUEST FOR PRODUCTION NO. 26:**

7 All DOCUMENTS submitted REGARDING reaching Milestones to trigger payments set
8 forth in LEVANDOWSKI'S employment agreement with UBER.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 26:**

10 Otto Trucking incorporates each of its general objections by reference. Otto Trucking
11 further objects to this Request as not "reasonably narrow" or relevant to its "trade secret
12 misappropriation claims *only*," as required by the Court's Order Granting in Part and Denying in
13 Part Plaintiff's Motion for Provisional Relief. (Dkt. No. 464).

14 Subject to and without waiving the foregoing objections, Otto Trucking responds as
15 follows: Otto Trucking will produce responsive, non-privileged documents in its possession,
16 custody or control following a diligent search.

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1 Dated: June 9, 2017

Respectfully submitted,

2 By: /s/ Neel Chatterjee

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19 *Attorneys for Defendant*
20 Otto Trucking LLC

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CERTIFICATE OF SERVICE

I, Rachel M. Walsh, declare as follows:

1. I am of counsel at the law firm of Goodwin Procter, LLP, whose address is Three Embarcadero Center, San Francisco, CA 94111. I am over the age of eighteen and not a party to this action.

2. On June 9th, 2017, I caused the following document to be served on all counsel of record via electronic mail: Defendant Otto Trucking LLC's Objections and Responses to Plaintiff Waymo LLC's Second Set of Expedited Requests for Production Pursuant to Paragraph Six of the May 11, 2017 Preliminary Injunction Order.

3. This document was transmitted via electronic mail to the addresses below, pursuant to the agreement between the parties, and the electronic mail transmission was reported as complete and without error.

Recipient	Email Address:
<p>QUINN EMANUEL URQUHART & SULLIVAN, LLP</p> <p>Charles K. Verhoeven (Bar No. 170151) David A. Perlson (Bar No. 209502) Melissa Baily (Bar No. 237649) John Neukom (Bar No. 275887) Jordan Jaffe (Bar No. 254886) 50 California Street, 22nd Floor San Francisco, California 94111-4788 Telephone: (415) 875-6600 Facsimile: (415) 875-6700</p>	QE-Waymo@quinnemanuel.com
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21		
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25 I declare under penalty of perjury that the foregoing is true and correct. Executed this 9th
 26 day of June, 2017, in San Francisco, CA.

27 /s/ Rachel M. Walsh
 28 Rachel M. Walsh
 Attorneys for OTTO TRUCKING LLC